

Update: Criminal Procedure Monograph 8—Felony Sentencing

Part II—Scoring the Statutory Sentencing Guidelines

8.6 Scoring an Offender's Offense Variables (OVs)

J. OV 9—Number of Victims

2. Case Law Under the Statutory Guidelines

Add the following text to the February 2006 update to page 58:

Note: On February 15, 2006, the Court of Appeals vacated section III of its opinion in *People v Melton*, ___ Mich App ___, ___ (2006), and pursuant to MCR 7.215(J)(3), ordered that the conflict between *Melton, supra*, and *People v Knowles*, 256 Mich App 53, 61–63 (2003), be resolved by a special panel convened for that purpose.